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June 25, 2013

Hon. Dora L. Irizarry
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Brent Saperjia
11 Cr. 486(DLI)

Dear Judge Irizarry:

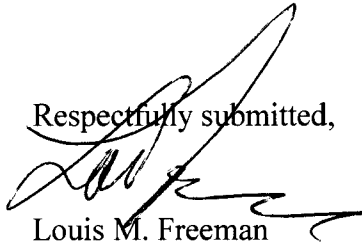
With the consent of the government by AUSA Gina Parlovecchio and Pretrial Services Officer Erin Rodriguez we write to request a modification of the bail conditions for the defendant in the above referenced case to permit travel within the continental United States. Currently, Mr. Saperjia's travel is restricted to the State of Arizona where he lives and the State of New York to attend court. However, this restriction has presented problems with Mr. Saperjia accepting work assignments on short notice because of the amount of time necessary to receive approval for the requests.

Mr. Saperjia works as an independent contractor recycling metal. Recent opportunities for work have been in California, New Mexico and Texas. In addition to recycling metal, Mr. Saperjia, a former professional hockey player and coach, has had an inquiry from semi-professional hockey team in Texas to coach there.

Mr. Saperjia's financial situation is not good. Last year Mr. Saperjia cleared approximately, \$35,000 from his business, with Mrs. Saperjia contributing approximately \$25,000. Mr. Saperjia and his wife have four young children. Mrs. Saperjia is about to lose her employment as the company she works for is closing at the end of the month.

Accordingly, we request modification of the defendant's travel restrictions to permit travel to the continental United States.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Louis M. Freeman', is written over the typed name. The signature is stylized with a large, sweeping initial 'L'.

Louis M. Freeman

cc: AUSA Gina Parlovecchio
PTSO Erin Rodriguez